

Robert Yaquinto, Jr.
State Bar No. 22115750
SHERMAN & YAQUINTO, L.L.P.
509 N. Montclair Avenue
Dallas, TX 75208-5498
214/942-5502 Fax: 214/946-7601
PROPOSED ATTORNEY FOR TRUSTEE

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

IN RE:

RICHARD JAMES CHRISTMAN,

DEBTOR

§
§
§
§
§

CASE NO. 22-31427-SWE-7

APPLICATION TO EMPLOY ATTORNEY AND PARALEGALS

ANY PARTY WISHING TO RESPOND TO THIS PLEADING MUST FILE THE RESPONSE WITH THE U.S. BANKRUPTCY CLERK, ROOM 1254, 1100 COMMERCE STREET, DALLAS, TX 75242, AND SERVE A COPY ON THE TRUSTEE AT 509 N. MONTCLAIR AVENUE, DALLAS, TX 75208, WITHIN 21 DAYS OF THE SERVICE OF THIS PLEADING. IF A RESPONSE IS FILED AND SERVED TIMELY, A HEARING ON THE RESPONSE WILL BE SCHEDULED WITH A NOTICE TO THE RESPONDING PARTY ONLY.

IF NO RESPONSE IS FILED AND TIMELY SERVED ON THE TRUSTEE, THE COURT MAY DEEM THE RELIEF REQUESTED UNOPPOSED AND MAY ENTER AN ORDER GRANTING THE RELIEF REQUESTED WITHOUT FURTHER NOTICE TO ANY PARTY.

TO THE HONORABLE SCOTT W. EVERETT, U.S. BANKRUPTCY JUDGE:

The Application of Robert Yaquinto, Jr., Trustee, respectfully represents:

1. The Applicant is the Trustee.
2. Applicant asserts that it is necessary to retain an attorney for the purposes of preparing documents to recover assets of the Estate; to represent the estate in adversary actions if necessary; to review transactions for possible preferences or fraudulent conveyances; to prepare Motions to Sell if appropriate; to review claims and, if necessary, file objections, and to render any other legal services that are necessary to administer the assets of this Estate.

3. The Applicant desires that he be authorized to retain Robert Yaquinto, Jr., and the law firm of Sherman & Yaquinto, L.L.P., as attorney and paralegals at a regular hourly rate based on time and standard billable charges to be approved by the Court, and for such compensation and reimbursement for expenses as is just. Based upon the information available to the Trustee at this time, professional fees and expenses will be at least \$2,500.00.

4. Robert Yaquinto, Jr. is an attorney admitted to practice in the Court with knowledge and experience in bankruptcy practice, qualified to render necessary legal services.

5. Robert Yaquinto, Jr. has not served as examiner to the estate; and to the best of Applicant's knowledge, he is a disinterested person having no connection with the Debtor, the creditors, or any other party in interest.

WHEREFORE, Applicant prays that he be authorized to retain and employ Robert Yaquinto, Jr., and the law firm of Sherman & Yaquinto, L.L.P., as attorney and paralegals to perform professional legal services in this proceeding, and for such other and further relief, both at law and in equity, to which he may show himself justly entitled.

Respectfully submitted,

/s/ Robert Yaquinto, Jr.

Robert Yaquinto, Jr.

State Bar No. 22115750

SHERMAN & YAQUINTO, L.L.P.

509 N. Montclair Avenue

Dallas, TX 75208-5498

214/942-5502 Fax: 214/946-7601

PROPOSED ATTORNEY FOR TRUSTEE

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing **APPLICATION TO EMPLOY ATTORNEY AND PARALEGALS** was forwarded by electronic transmission to the U.S. Trustee, 1100 Commerce Street, Room 976, Dallas, TX 75242, and by electronic transmission to Debtor's attorney, Warren V. Norred, Norred Law PLLC, 515 E. Border Street, Arlington, TX 76010, and the parties receiving electronic notice on this 16th day of November, 2022.

/s/ Robert Yaquinto, Jr.
Robert Yaquinto, Jr.

Robert Yaquinto, Jr.
State Bar No. 22115750
SHERMAN & YAQUINTO, L.L.P.
509 N. Montclair Avenue
Dallas, TX 75208-5498
214/942-5502 Fax: 214/946-7601
PROPOSED ATTORNEY FOR TRUSTEE

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

IN RE:

RICHARD JAMES CHRISTMAN,

DEBTOR

§
§
§
§
§

CASE NO. 22-31427-SWE-7

AFFIDAVIT OF PROPOSED ATTORNEY

THE STATE OF TEXAS §
 §
COUNTY OF DALLAS §

I, Robert Yaquinto, Jr., hereby make a solemn oath:

1. That I am an attorney at law, duly admitted to practice in the State of Texas and in this Court.
2. I am with the firm of Sherman & Yaquinto, L.L.P., 509 N. Montclair Avenue, Dallas, Texas 75208. The firm has no connection with the above-named Debtor, its creditors or any other party in interest herein or their respective attorneys.
3. Neither I nor my firm have now, nor have we ever held or represented any interest adverse to the estate other than as disclosed above, and we are now and throughout these proceedings have been "disinterested persons" within the meaning of 11 U.S.C. §101(14).
4. Robert Yaquinto, Jr., and the law firm of Sherman & Yaquinto, L.L.P., desire to be employed to represent the Trustee in these proceedings with compensation to be allowed and directed to be paid pursuant to the Order of this Court.

/s/ Robert Yaquinto, Jr.
Robert Yaquinto, Jr.

SUBSCRIBED AND SWORN TO BEFORE ME by **Robert Yaquinto, Jr.** on this
16th day of November, 2022.

/s/ Dana B. Wiggins
NOTARY PUBLIC, in and for
the State of Texas